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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

SHARON BARNUM; and ROBERT
SUSTRIK, and all similarly situated,

Plaintiffs,

v.

EQUIFAX INFORMATION SERVICES,
LLC,

Defendant.

Case No.: 2:16-cv-2866-RFB-NJK

**DECLARATION OF MATTHEW I.
KNEPPER, ESQ. IN SUPPORT OF
SERVICE METHOD FOR UNREDACTED
COPY OF PLAINTIFFS' FIRST
AMENDED MOTION FOR CLASS
CERTIFICATION AND APPOINTMENT
OF CLASS COUNSEL AND EXHIBITS 1, 3
– 9, 11 – 17, 21 – 22, and 25**

I, Matthew I. Knepper, Esq., hereby state and declare as follows:

1. I am an attorney of law, duly licensed and admitted to practice law before the United States District court for the District of Nevada. I am a partner in the law firm of Knepper & Clark, LLC, which serves as counsel for Sharon Barnum and Robert Sustrik, Plaintiffs in the matter of *Cabebe v. Equifax Information Services, LLC*, Case No. 2:16-cv-02866-RFB-NJK (D. Nev. 2016) (the "Action").

2. I am over the age of 18. I have personal knowledge of the following facts, and I am competent to testify to the following facts upon my own personal knowledge.
3. I make this declaration to demonstrate why Plaintiff has good cause for declining to serve unsealed paper copies of their *First Amended Motion For Class Certification and Appointment of Class Counsel* against Defendant Equifax Information Services, LLC's ("Equifax") ("Motion") and Exhibits 1, 3 – 9, 11 – 17, 21 – 22, and 25 ("Exhibits").
4. Under District of Nevada Local Rule IA 10-5(c), "An attorney or pro se party who files a document under seal must include with the document either (i) a certificate of service certifying that the sealed document was served on the opposing attorneys or pro se parties, or (ii) an affidavit showing good cause why the document has not been served on the opposing attorneys or pro se parties."
5. Good cause exists under LR IA 10-5(c) not to serve Equifax with unredacted paper copies of the Motion.
6. Plaintiff and Equifax are the only parties in the case.
7. A sealed copy of the Motion will be served electronically via CM/ECF on the same day sealed copy is filed.
8. Further, and because Equifax is the party which supplied the great majority of the sealed material relevant to the Motion, Plaintiff will also direct an unredacted copy of the Motion to be emailed to Equifax's counsel on the same day the same is filed with the Court.
9. It has been the parties' customary practice to exchange documents via email. The parties' Scheduling Order provides for electronic service of discovery documents.
10. Moreover, all of the confidential documents produced by Plaintiffs which warrant the sealing of these document were (1) produced by Equifax, or its agent FIS Card, or (2) concern testimony elicited from Equifax's 30(b)(6) witnesses. Since Equifax is the party that supplied the great majority of "confidential" material relevant to the Motion, the failure to serve an unredacted paper copy of the Motion on Equifax will not prejudice any response Equifax may elect to file.
11. In light of these circumstances, there is good cause not to effect paper service of the unredacted Motion on Equifax, as Experian will not be prejudiced by Plaintiff's decision not to serve the same.

1 I declare under penalty of perjury of the laws of the United States and the State of Nevada that the
2 foregoing is true and correct.

3 Executed in Las Vegas on August 6, 2018.

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5 /s/ Matthew I. Knepper, Esq.
6 Matthew I. Knepper, Esq.
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CERTIFICATE OF SERVICE

I hereby certify that on August 7, 2018, and pursuant to the Federal Rules of Civil Procedure, a true and correct copy of the foregoing **DECLARATION OF MATTHEW I. KNEPPER, ESQ. IN SUPPORT OF SERVICE METHOD FOR UNREDACTED COPY OF PLAINTIFFS' FIRST AMENDED MOTION FOR CLASS CERTIFICATION AND APPOINTMENT OF CLASS COUNSEL AND EXHIBITS1, 3 – 9, 11 – 17, 21 – 22, and 25** was served via the U.S. District Court's electronic filing system to all individuals entitled to receive service thereon.

/s/ Lucille Chiusano
An Employee of Knepper & Clark LLC